



STATE OF MARYLAND

*

NO. D-111-CR-23-000893

v. **Judge Dino Ernesto Flores, Jr.** IN THE DISTRICT COURT FOR

CHELSEA ELIZABETH PHOENIX

*

FREDERICK COUNTY, MD

* * * * *

STATE'S PETITION TO REVOKE BOND

COMES NOW, the State of Maryland, by and through Lindsey M. Carpenter, Assistant State's Attorney for Frederick County, Maryland, and pursuant to Maryland Rule 4-216.3(d) moves this Honorable Court to revoke the Defendant's bond in the above-captioned case, for the following reasons:

1. On June 6, 2023 the Defendant was charged with Second Degree Rape and Third Degree Sexual Offense.
2. On June 9, 2023 the Defendant was released on her own recognizance and placed on pre-trial supervision through the Frederick County Sheriff's Office.
3. Since the Defendant's release, she has sent numerous messages via social media to minors.
4. One condition of the Defendant's release was to have no contact with any minors.
5. Furthermore, the State has since learned that the Defendant is unable to be supervised by the Frederick County Sheriff's Office pre-trial supervision unit.

WHEREFORE, as the Defendant has violated her pretrial release conditions by having contact with minors, and the Defendant is unable to be supervised by pre-trial supervision, the State respectfully requests this Honorable Court revoke the Defendant's bond.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of June, 2023, a copy of the foregoing State's Petition to Revoke Bond was sent via MDEC and/or Sharefile, a secure file sharing service, to the designated e-mail address and/or service contact for Ashley Sener, Esquire, the Attorney for the Defendant herein.



LINDSEY M. CARPENTER
ASSISTANT STATE'S ATTORNEY